

BURSOR & FISHER, P.A.
Neal Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

Attorneys for Plaintiffs

GIBSON, DUNN & CRUTCHER LLP
Lauren R. Goldman (*pro hac vice*)
lgoldman@gibsondunn.com
Darcy C. Harris (*pro hac vice*)
dharris@gibsondunn.com
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

Attorneys for Defendant

Additional Attorneys on Signature Page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

This document relates to:

All actions

Master File No. 5:22-cv-07557-PCP

**STIPULATION AND ~~PROPOSED~~
ORDER TO MODIFY DAUBERT
MOTION BRIEFING DEADLINES**

[L.R. 6-2]

The parties jointly ask the Court for an extension of the deadlines for the parties' pending and forthcoming Daubert motions related to Plaintiffs' motion for class certification (the "Class Motion"). The parties make this request because, while they previously sought from the Court and obtained a modified schedule for the parties' briefing of the Class Motion, *see* ECF No. 195 ("Scheduling Order"), in doing so they did not clarify that any Daubert motions in support of or in opposition to the Class Motion, and any opposition or reply briefs, should proceed in parallel with the briefing. As the current Scheduling Order does not reflect this, pursuant to Civil L.R. 7-3 Plaintiffs' oppositions to Meta's Daubert motions filed October 27, 2025, *see* ECF Nos. 230, 233, are due within 14 days, and Meta's subsequent reply briefs are due within seven days.

Counsel have met and conferred and have agreed, subject to approval by the Court, to alter the deadlines for responding to all Daubert motions in support of, or in opposition to, the Class Motion to align with other briefing deadlines:

Event	Current Deadline	Proposed New Deadline
Plaintiffs' Oppositions to Meta's Motions to Exclude Plaintiffs' Class Motion Experts	November 10, 2025	December 15, 2025 (current deadline for Plaintiffs' Reply in Support of Class Motion)
Meta's Replies in Support of its Motions to Exclude Plaintiffs' Class Motion Experts	November 17, 2025	January 14, 2026
Plaintiffs' Motions to Exclude Meta's Class Motion Experts (if any)	December 15, 2025	(No Change)
Meta's Oppositions to Plaintiffs' Motions to Exclude Meta's Class Motion Experts (if any)	December 29, 2025	January 21, 2026
Plaintiffs' Replies in Support of their Motions to Exclude Meta's Class Motion Experts (if any)	January 5, 2026	February 13, 2026
Hearing on Class Motion	January 15, 2026 at 10:00 am	February 26, 2026 at 10:00 am

There were two prior requests to alter the class certification briefing schedule, both of which the Court granted. *See* ECF Nos. 156, 195. There is compelling good cause for this request because the parties require sufficient time to review and respond to the opposing parties' Daubert motions, and reply in support of their own Daubert Motions, which may require additional discovery.

Moreover, modifying the briefing schedule as requested by the parties aligns the briefing schedules of the Daubert motions with the Class Motion, as is typically done.

The Court has not set any deadlines other than for class certification briefing, and so granting this request will have no other effect on the schedule for the case. Accordingly, the parties jointly ask the Court to modify the current deadlines according to the new dates set forth above.

Dated: October 31, 2025

GEORGE FELDMAN MCDONALD, PLLC

By: /s/ Michael Liskow
Michael Liskow

Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
102 Half Moon Bay Drive
Croton-on-Hudson, NY 10520
Telephone: (917) 983-9321
E-mail: lfeldman@4-justice.com
mliskow@4-justice.com
eservice@4-justice.com

BURSOR & FISHER, P.A.
Neal Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

SMITH KRIVOSHEY, P.C.
Joel D. Smith (State Bar No. 244902)
867 Boylston Street, 5th Floor
Boston, MA 02216
Telephone: 617-377-7404
Email: joel@skclassactions.com

GEORGE FELDMAN MCDONALD, PLLC
Rebecca A. Peterson (State Bar No. 241858)
1650 West 82nd Street, Suite 880
Bloomington, MN 55431
Telephone: (612) 778-9595
Facsimile: (888) 421-4173
E-mail: rpeterson@4-Justice.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Kate M. Baxter-Kauf (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
E-mail: kmbaxter-kauf@locklaw.com

THE HODA LAW FIRM, PLLC

Marshal J. Hoda, Esq. (*pro hac vice*)
12333 Sowden Road, Suite B
Houston, TX 77080
Telephone: (832) 848-0036
Email: marshal@thehodalawfirm.com

FOSTER YARBOROUGH PLLC

Patrick Yarborough, Esq. (*pro hac vice*)
917 Franklin Street, Suite 220
Houston, TX 77002
Telephone: (713) 331-5254
Email: patrick@fosteryarborough.com

EMERSON FIRM, PLLC

John G. Emerson (*pro hac vice*)
2500 Wilcrest, Suite 300
Houston, TX 77042
Telephone: (800) 551-8649
Email: jemerson@emersonfirm.com

Attorneys for Plaintiffs

Dated: October 31, 2025

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Lauren R. Goldman
Lauren R. Goldman

LAUREN R. GOLDMAN (*pro hac vice*)
lgoldman@gibsondunn.com
DARCY C. HARRIS (*pro hac vice*)
dharris@gibsondunn.com
200 Park Avenue New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184
emccloskey@gibsondunn.com
ABIGAIL A. BARRERA, SBN 301746
abarrera@gibsondunn.com
One Embarcadero Center, Suite 2600 San Francisco,
CA 94111-3715
Telephone: (415) 393-8200
Facsimile: (415) 393-8306

LATHAM & WATKINS LLP
MELANIE M. BLUNSCHI, SBN 234264
melanie.blunsch@lw.com
KRISTIN I. SHEFFIELD-WHITEHEAD, SBN
304635
kristin.whitehead@lw.com
DIANNE KIM, SBN 348367
dianne.kim@lw.com
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Telephone: (415) 395-8129
Facsimile: (415) 395-8095

MARISSA ALTER-NELSON (*pro hac vice*)
marissa.alter-nelson@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200

JESSICA STEBBINS BINA, SBN 248485
jessica.stebbinsbina@lw.com
10250 Constellation Blvd., Suite 1100
Los Angeles, CA 90067
Telephone: (424) 653-5500
Facsimile: (424) 653-5501

CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.


Dated: October 31, 2025

By: /s/ Michael Liskow
Michael Liskow

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: November 4, 2025



Hon. P. Casey Pitts
U.S. District Judge